

STATEMENT OF BASIS (AI No. 19543)

for draft Louisiana Pollutant Discharge Elimination System permit No. LA0072397 to discharge to waters of the State of Louisiana.

THE APPLICANT IS: 3-G Enterprises, Inc.
Griffin's Seafood
Post Office Box 640
Golden Meadow, Louisiana 70357

ISSUING OFFICE: Louisiana Department of Environmental Quality (LDEQ)
Office of Environmental Services
Post Office Box 4313
Baton Rouge, Louisiana 70821-4313

PREPARED BY: Michelle Bickham

DATE PREPARED: May 27, 2009

1. PERMIT STATUS**A. Reason For Permit Action:**

Permit reissuance of a Louisiana Pollutant Discharge Elimination System (LPDES) permit for a 5-year term

B. LPDES permits – LA0072397
LPDES permit effective date: December 1, 2003
LPDES permit expiration date: November 30, 2008

C. Date Application Received: February 13, 2009

2. FACILITY INFORMATION**A. FACILITY TYPE/ACTIVITY - dockside seafood packing facility**

3-G Enterprises, Inc., Griffin Seafood is an existing dockside seafood packing facility located in Lafourche Parish. Both fish and shrimp are unloaded from boats. Fish and shrimp are washed then packed into boxes. Wastewater consists of shrimp and fish tank washwater, dock washdown wastewater, and stormwater runoff from the dock unloading area. Sanitary wastewater is treated by an extended aeration package treatment plant before being discharged to Bayou Lafourche.

B. FEE RATE

1. Fee Rating Facility Type: minor
2. Complexity Type: II*
3. Wastewater Type: II
4. SIC code: 2092

*SIC Code 2092 has a complexity type of II with a corresponding 10 points. The points have been BPJ'ed to 0 to be consistent with other seafood processors.

C. LOCATION - 24225 Highway 1, Leeville, Lafourche Parish
Latitude 29° 15' 34", Longitude 90° 12' 53"

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3. OUTFALL INFORMATION

Outfall 001

Discharge Type: seafood washing and packing wastewater, dock washdown wastewater, and stormwater runoff
Treatment: none
Location: at the point of discharge from the fish tank pipe
Flow: 630 gpd
Discharge Route: pipe thence to Bayou Lafourche

Outfall 002

Discharge Type: seafood washing and packing wastewater, dock washdown wastewater, and stormwater runoff
Treatment: none
Location: at the point of discharge from the shrimp tank pipe
Flow: 1150 gpd
Discharge Route: pipe thence to Bayou Lafourche

Outfall 003

Discharge Type: treated sanitary wastewater
Treatment: sewage treatment plant with extended aeration
Location: at the point of discharge from the sewage treatment plant
Flow: 100 gpd
Discharge Route: pipe thence to Bayou Lafourche

4. RECEIVING WATERS

STREAM - pipe thence to Bayou Lafourche

BASIN AND SEGMENT - Barataria Basin, Segment 020403

DESIGNATED USES -
a. primary contact recreation
b. secondary contact recreation
c. propagation of fish and wildlife
e. oyster propagation

5. TMDL STATUS

Subsegment 020403 is not listed on LDEQ's Final 2006 303(d) List as impaired, and to date no TMDL's have been established. A reopener clause will be established in the permit to allow for the requirement of more stringent effluent limitations and requirements as imposed by any future TMDLs.

6. PROPOSED EFFLUENT LIMITS

BASIS - See Rationale below.

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Changes from previous permit:

- The limits for Outfall 003 has been updated in accordance with the reissuance of the Class I Sanitary Discharge General Permit and the fecal coliform weekly average limit has been changed to a daily max limit.
- The monitoring frequency for Outfall 002 will be increased from 1/quarter to monthly.
- The monitoring frequency for Outfall 003 will be increased from 1/6 months to quarterly.

7. COMPLIANCE HISTORY/COMMENTS

There was an inspection at the facility as part of the Bayou Lafourche Watershed Project on August 22, 2007. The inspection stated that the facility was permitted, and that the DMR's for the second quarter of 2007 were reviewed.

DMR's were reviewed for the last two years (1/07 - 12/08). There were no excursions found for Outfall 001. No DMR's were submitted for Outfalls 002 and 003. The facility was contacted for the missing DMR's; however, there were no samples pulled for these outfalls.

8. EXISTING EFFLUENT LIMITS

Outfall 001 – shrimp and fish washing and packing wastewater, dock washdown wastewater, and stormwater runoff from the dock unloading area

Parameter	LPDES	
	Monthly Average	Daily Maximum
Flow	Report 1/quarter Est.	Report 1/quarter Est.
BOD ₅	7.4 lbs/day 1/quarter Composite	14.8 lbs/day 1/quarter Composite
TSS	9.5 lbs/day 1/quarter Composite	19.0 lbs/day 1/quarter Composite
Oil & Grease	1.7 lbs/day 1/quarter Composite	3.5 lbs/day 1/quarter Composite
pH	6.0-9.0 s.u. 1/quarter Grab	

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Outfall 002 – shrimp and fish washing and packing wastewater, dock washdown wastewater, and stormwater runoff from the dock unloading area

Parameter	LPDES	
	Monthly Average	Daily Maximum
Flow	Report 1/quarter Est.	Report 1/quarter Est.
BOD ₅	14.8 lbs/day 1/quarter Composite	29.6 lbs/day 1/quarter Composite
TSS	19.0 lbs/day 1/quarter Composite	38.0 lbs/day 1/quarter Composite
Oil & Grease	3.5 lbs/day 1/quarter Composite	7.0 lbs/day 1/quarter Composite
pH	6.0-9.0 s.u. 1/quarter Grab	

Outfall 003 – treated sanitary wastewater

Parameter	LPDES	
	Monthly Average	Daily Maximum
Flow	Report 1/6 months Est.	Report 1/6 months Est.
BOD ₅	---	45 mg/L 1/6 months Grab
TSS	---	45 mg/L 1/6 months Grab
Fecal Coliform	---	43 col/100 mL 1/6 months Grab
pH	6.0-9.0 s.u. 1/6 months Grab	

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9. ENDANGERED SPECIES

The receiving waterbody, Subsegment 020403 of the Barataria Basin is not listed in Section II.2 of the Implementation Strategy as requiring consultation with the U.S. Fish and Wildlife Service (FWS). This strategy was submitted with a letter dated November 17, 2008 from Rieck (FWS) to Nolan (LDEQ). Therefore, in accordance with the Memorandum of Understanding between the LDEQ and the FWS, no further informal (Section 7, Endangered Species Act) consultation is required. The effluent limitations established in the permit ensure protection of aquatic life and maintenance of the receiving water as aquatic habitat. Therefore, the issuance of the LPDES permit is not likely to have an adverse effect on any endangered or candidate species or the critical habitat.

10. HISTORIC SITES

The discharge is from an existing facility location, which does not include an expansion on undisturbed soils. Therefore, there should be no potential effect to sites or properties on or eligible for listing on the National Register of Historic Places, and in accordance with the "Memorandum of Understanding for the Protection of Historic Properties in Louisiana Regarding LPDES Permits" no consultation with the Louisiana State Historic Preservation Officer is required.

11. TENTATIVE DETERMINATION

On the basis of preliminary staff review, the Department of Environmental Quality has made a tentative determination to issue a permit for the discharge described in the application.

12. PUBLIC NOTICES

Upon publication of the public notice, a public comment period shall begin on the date of publication and last for at least 30 days thereafter. During this period, any interested persons may submit written comments on the draft permit and may request a public hearing to clarify issues involved in the permit decision at this Office's address on the first page of the statement of basis. A request for a public hearing shall be in writing and shall state the nature of the issues proposed to be raised in the hearing.

Public notice published in:

Local newspaper of general circulation

Office of Environmental Services Public Notice Mailing List

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Rationale for 3-G Enterprises, Inc.

1. **Outfall 001** - seafood washing and packing wastewater, dock washdown water, and stormwater runoff (estimated flow is 630 gpd)

Pollutant	Limitation		Reference
	Monthly Avg	Daily Max	
	lbs/day		
Flow	Report	Report	Previous permit, BPJ
BOD ₅	7.4	14.8	Previous permit, BPJ
TSS	9.5	19.0	Previous permit, BPJ
Oil & Grease	1.7	3.5	Previous permit, BPJ
pH	6.0	9.0	Previous permit, BPJ

Treatment: none

Monitoring Frequency: Quarterly for all parameters at the point of discharge from the fish tank pipe.

Limits Justification: Limits are based on the previous permit. A review of the available DMR's from the last 5 years showed the discharge results are substantially less than the permit limits; therefore, the limits from the previous permit will remain in the permit.

2. **Outfall 002** - seafood washing and packing wastewater, dock washdown water, and stormwater runoff (estimated flow is 1150 gpd)

Pollutant	Limitation		Reference
	Monthly Avg	Daily Max	
	lbs/day		
Flow	Report	Report	Previous permit, BPJ
BOD ₅	14.8	29.6	Previous permit, BPJ
TSS	19.0	38.0	Previous permit, BPJ
Oil & Grease	3.5	7.0	Previous permit, BPJ
pH	6.0	9.0	Previous permit, BPJ

Treatment: none

Monitoring Frequency: Monthly for all parameters at the point of discharge from the shrimp tank pipe. The monitoring has been increased from 1/quarter to monthly based on the fact there were no DMR's sent in for this outfall.

Limits Justification: Limits are based on the previous permit. The previous permit stated that this tank is twice the size of the tank discharging to Outfall 001; therefore, the limits for Outfall 002 in the previous permit were double that of the permit limits for Outfall 001. There were no DMR's sent in for this outfall. However, a review of the available DMR's from the last 5 years for Outfall 001 showed the discharge results are substantially less than the permit limits. Because the effluent for Outfall 002 should be comparable to that of Outfall 001, the limits for Outfall 002 will remain the same as in the previous permit.

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NOTE: For Outfalls 001 and 002, composite samples for BOD, TSS, and Oil and Grease shall consist of proportional aliquots of wash tank dump waters and dock washdown water.

3. **Outfall 003** - treated sanitary wastewater (estimated flow is 100 gpd)

Pollutant	Limitation		Reference
	Monthly Avg	Weekly Avg	
	mg/L		
Flow	---	Report	
BOD ₅	30	45	Similar discharges* (BPJ), LAG530000
TSS	30	45	Similar discharges* (BPJ), LAG530000
Fecal Coliform colonies/100ml	14	43 (Daily Max)	Similar discharges* (BPJ), LAG530000
pH, s.u.	6.0 (min)	9.0 (max)	Similar discharges* (BPJ), LAG530000

Treatment: sewage treatment plant

Monitoring Frequency: Quarterly for all parameters at the point of discharge from the sewage treatment plant. The monitoring frequency for this outfall is being increased from 1/6 months to quarterly based on the fact there were no DMR's sent in for this outfall.

Limits Justification: Limits are based on current guidance for similar discharges from other industrial facilities and the Class I Sanitary Discharge General Permit, LAG530000 effective November 1, 2007.

* Existing permits for similar outfalls
 BPJ Best Professional Judgement
 su Standard Units

NOTE

For outfalls containing concentration limits, the usage of concentration limits is based on BPJ for similar outfalls since the flow is variable and estimated.

EFFLUENT BMP's

The permittee shall ensure that any solids that could not pass through a 1/2 inch sieve screen are prevented from entering the discharge. The permittee shall develop techniques to reduce the flow of suspended solids into the receiving waterbody. This may include such techniques as allowing settling time and removing settled solids by pump from the tank bottoms prior to discharge or installing a stand pipe in the tank bottoms to prevent settled solids from flowing into the discharge. Solids removed from the tanks shall be disposed as other putrescible waste.

STORM WATER POLLUTION PREVENTION PLAN (SWP3) REQUIREMENT

A SWP3 is included in the permit because in accordance with LAC 33:IX.2511.A.1, storm water discharges shall not be required to obtain an LPDES permit "... except... discharges associated with industrial activity." In accordance with LAC 33:IX.2511.B.14.a-k, facilities classified as SIC code 2092 are considered to have storm water discharges associated with industrial activity.

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For first time permit issuance, the SWP3 shall be prepared, implemented, and maintained within six (6) months of the effective date of the final permit. **For renewal permit issuance**, the SWP3 shall be reviewed and updated, if necessary, within six (6) months of the effective date of the final permit. The plan should identify potential sources of storm water pollution and ensure the implementation of practices to prevent and reduce pollutants in storm water discharges associated with industrial activity at the facility (see Narrative Requirements for the AI).

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LOUISIANA WATER POLLUTION CONTROL FEE SYSTEM
-RATING WORKSHEET
PERMIT NO. LA0072397 AI NO. 19543
April 16, 2009

1.	Company Name:	<u>3-G Enterprises, Inc.</u>
	Facility Name:	<u>Griffin's Seafood</u>
		<u>Post Office Box 640</u>
2.	Local Mailing Address:	<u>Golden Meadow, Louisiana 70357</u>
3.	Billing Address (If different):	_____
4.	Facility Location:	<u>24225 Highway 1, Leesville</u>
	Parish:	<u>Lafourche</u>
5.	Facility Type:	<u>dockside seafood packing facility</u>
	Treatment Process Used:	_____
6.	Products Produced:	_____
	Raw materials stored or used:	_____
	By-products produced:	_____
7.	Primary SIC Code:	<u>2092</u>
	Other SIC Codes:	_____
8.	Fac. Manager:	<u>Archie Dantin</u>
	Telephone:	<u>(985)396-2453</u>
9.	Owner:	_____
	Telephone:	_____
10.	Env. Contact:	_____
	Telephone:	_____
11.	NPDES/LPDES Permit No.	<u>LA0072397</u>
	Effective Date:	<u>December 1, 2003</u>
	Expiration Date:	<u>November 30, 2008</u>
12.	Number and ID of Outfalls:	<u>Outfall 001 and 002 – seafood washing and packing water, dock washdown water, and stormwater runoff; Outfall 003 – treated sanitary wastewater</u>
13.	Number of Injection Wells:	_____
14.	Water Source(s):	_____
15.	Receiving Water(s):	<u>pipe thence to Bayou Lafourche</u>
16.	River Basin:	<u>Barataria</u>
	Subsegment Number:	<u>020403</u>
17.	Federal Tax ID Number:	_____
18.	Rater:	<u>mlb</u>

TOTAL RATING POINTS: 0

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ANNUAL FEE RATING WORKSHEET - Industrial**PERMIT NO. LA0072397; AI 19543****April 16, 2009****1. FACILITY COMPLEXITY DESIGNATION**Primary Sic: 2092

Complexity Designation:

<u> </u>	I	(0 Points)
<u> X </u>	II	(10 points)BPJ points to 0.
<u> </u>	III	(20 points)
<u> </u>	IV	(30 points)
<u> </u>	V	(40 points)
<u> </u>	VI	(50 points)

COMPLEXITY DESIGNATION POINTS 0**2. FLOW VOLUME AND TYPE**

A. Wastewater Type I - Is total Daily Average Discharge greater than 400 mgd?

 Yes, then points = 200 No, then

Points = 0.5 x Total Daily Average Discharge (mgd)

Points = 0.5 x = Total Points =

B. Wastewater Type II

Points = 10 x Total Daily Average Discharge (mgd)

Points = 10 x 0.00188 = 0.0188Total Points = 0

C. Wastewater Type III

Points = 2 x Total Daily Average Discharge (mgd)

Points = 2 x = Total Points = **FLOW VOLUME AND TYPE POINTS 0****3. POLLUTANTS**A. BOD₅ or

Daily Average Load =

<u> X </u>	≤ 50 lb/day	(0 Points)
<u> </u>	> 50 - 500	(5 points)
<u> </u>	> 500 - 1000	(10 points)
<u> </u>	> 1000 - 3000	(20 points)
<u> </u>	> 3000 - 5000	(30 points)
<u> </u>	> 5000 lb/day	(calculate)

Points = 0.008 x Daily Average Load (lbs)

Points = 0.008 x =

COD or

Daily Average Load =

<u> </u>	≤ 100 lb/day	(0 Points)
<u> </u>	> 100 - 500	(5 points)
<u> </u>	> 500 - 1000	(10 points)
<u> </u>	> 1000 - 5000	(20 points)
<u> </u>	> 5000 - 10000	(30 points)
<u> </u>	> 10000 lb/day	(calculate)

Points = 0.004 x Daily Average Load (lbs)

Points = 0.004 x = BOD or COD Demand Points (whichever is greater) 0